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*Attorneys for Garnishee China Merchants Bank Co. Ltd.*

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

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 PLAMAR NAVIGATION LTD,

Plaintiff,

- against -

TIANJIN SHENGJIA SHIPPING CO., LTD a/k/a :  
 SHENGJZA (HONG KONG) SHIPPING AND :  
 TRADING CO., LTD., CHANGSHU NEW :  
 CHANGGANG TRADE CO. LTD., HANGZHOU :  
 HEAVY STEEL PIPE CO. LTD., HENGYANG :  
 STEEL TUBE GROUP INT'L TRADING INC., :  
 HUBEI XIN YEGANG CO., LTD. a/k/a HUBEI :  
 XIN YEGANG STEEL CO. LTD., JIANGSU :  
 CHANGSHU MARINE SHIPPING AGENCY CO. :  
 LTD., JIANGSU LIHUI IRON AND STEEL CO., :  
 LTD., JIANGSU PROS.A INT'L CO., LTD., :  
 JIANGSU XINGCHENG SPECIAL STEEL :  
 WORKS CO., LTD., KUGLER HAAS, LALANI :  
 STEEL INC., FASTEN BLOC SHANGHAI IMP. :  
 AND EXP. CO., FASTEN BLOC IMP. AND EXP. :  
 CO., LTD., SUZHOU HUASHENG IMP. AND :  
 EXP., CO., LTD., SUZHOU SEAMLESS STEEL :  
 TUBE WORKS, VICTORY LOGISTICS INT'L :  
 CO., LTD., WUXI DINGYUAN PRECISION :  
 COLD DRAWN STEEL PIPE CO. LTD., WUXI :  
 TIAN LIANG FOREIGN TRADE CO. LTD., :  
 XIGANG SEAMLESS STEEL TUBE CO. LTD. :  
 YIEH CORPORATION LTD., and YIZHENG :  
 HAITIAN ALUMINUM INDUSTRIAL :  
 CO., LTD., :

Defendants,

09cv5447 (SHS)

**ANSWER OF GARNISHEE  
 CHINA MERCHANTS BANK  
 CO. LTD. NEW YORK BRANCH  
 IN RESPONSE TO MARITIME  
 ATTACHMENT AND  
 GARNISHMENT**

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TO THE MARSHALL OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK:

Pursuant to Rule B(3)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure and in response to a certain Process of Maritime Attachment and Garnishment in the above-captioned matter dated July 8, 2009, and served upon Garnishee China Merchants Bank Co. Ltd. New York Branch on or about July 17, 2009, Garnishee China Merchants Co. Ltd. New York Branch hereby states that on such date of service and through and to the date of this response, it was not indebted to the Defendants TIANJIN SHENGJIA SHIPPING CO., LTD a/k/a SHENGJZA (HONG KONG) SHIPPING TRADING CO., LTD., CHANGSHU NEW CHANGGANG TRADE CO. LTD., HANGZHOU HEAVY STEEL PIPE CO. LTD., HENGYANG STEEL TUBE GROUP INT'L TRADING INC., HUBEI XIN YEGANG CO., LTD. a/k/a HUBEI XIN YEGANG STEEL CO. LTD., JIANGSU CHANGSHU MARINE SHIPPING AGENCY CO. LTD., JIANGSU LIHUI IRON AND STEEL CO., LTD., JIANGSU PROS.A INT'L CO., LTD., JIANGSU XINGCHENG SPECIAL STEEL WORKS CO., LTD., KUGLER HAAS, LALANI STEEL INC., FASTEN BLOC SHANGHAI IMP. AND EXP. CO., FASTEN BLOC IMP. AND EXP. CO., LTD., SUZHOU HUASHENG IMP. AND EXP., CO., LTD., SUZHOU SEAMLESS STEEL TUBE WORKS, VICTORY LOGISTICS INT'L CO., LTD., WUXI DINGYUAN PRECISION COLD DRAWN STEEL PIPE CO. LTD., WUXI TIAN LIANG FOREIGN TRADE CO. LTD., XIGANG SEAMLESS STEEL TUBE CO. LTD. YIEH CORPORATION LTD., or YIZHENG HAITIAN ALUMINUM INDUSTRIAL CO., LTD., and did not otherwise have in its possession any property, tangible or intangible, including funds, assets, cash, goods, chattels, credits, effects, debts, owed by or owed to the defendant(s) or monies to be paid to discharge a debt

owed to the defendant(s), including monies being transferred by, to or for the benefit of the defendant(s).

Dated: New York, New York.  
August 10, 2009

SIDLEY AUSTIN LLP

By: /s/ Nicholas K. Lagemann  
Nicholas K. Lagemann  
787 Seventh Avenue  
New York, New York 40049  
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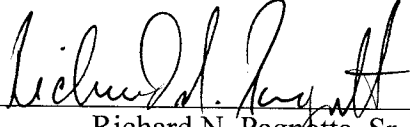
*Attorneys for Garnishee  
China Merchants Bank Co. Ltd.*

**VERIFICATION**

STATE OF NEW YORK     )  
  ) ss.:  
COUNTY OF NEW YORK    )

Richard N. Pagnotta, Sr., being duly sworn, deposes and says as follows:

I am the Vice President and Chief Compliance Officer for China Merchant Bank Co. Ltd. New York Branch. I have reviewed the contents of the foregoing Answer of Garnishee China Merchants Bank Co. Ltd. New York Branch in response to Plaintiff's Maritime Attachment and Garnishment in docket no. 09cv5447 and know the contents thereof and that the same are true to the best of my known knowledge. I base this upon personal knowledge, review of China Merchant Bank Co. Ltd. New York Branch's files, and communications with relevant employees of the Bank.

  
Richard N. Pagnotta, Sr.

Sworn to before me on  
August 10, 2009

  
Notary Public

**JASON MARRA**  
Notary Public, State of New York  
No. 01NAB170074  
Qualified in New York County  
Commission Expires Oct. 01, 2011

**CERTIFICATE OF SERVICE**

I Nicholas K. Lagemann hereby certify that on this 10th day of August, 2009, I caused the foregoing Answer of Garnishee China Merchants Bank Co. Ltd. New York Branch in Response to Maritime Attachment and Garnishment to be served by ECF and email upon:

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*Counsel for Plaintiff*

/s/ Nicholas K. Lagemann  
Nicholas K. Lagemann